

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**PLAINTIFF'S ASSENTED-TO MOTION FOR LEAVE TO FILE A REPLY  
MEMORANDUM IN SUPPORT OF ITS MOTION FOR A PROTECTIVE ORDER AND  
TO QUASH DEPOSITION NOTICES**

Pursuant to Local Rule 7.1(b)(3), Plaintiff, Students for Fair Admissions, Inc. (“SFFA”), respectfully moves for leave to submit a reply memorandum in support of SFFA’s Motion for a Protective Order and to Quash Deposition Notices (the “Motion”).<sup>1</sup> The Motion seeks to quash the depositions of two of SFFA’s officers. A reply memorandum for the Motion is warranted to address certain assertions and arguments in Defendant’s opposition which require a response. Pursuant to Local Rule 7.1(a)(2), Defendant was made aware of this motion and assents to it. If this motion is granted, SFFA shall submit its reply memorandum by April 12, 2017.

WHEREFORE, SFFA respectfully requests that the Court grant its motion for leave to file a reply memorandum in support of the Motion.

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<sup>1</sup> The Motion (including SFFA’s accompanying memorandum) was filed under seal on March 22, 2017, per court order (Dkt. 259). Harvard’s opposition to the Motion was also filed under seal on April 5, 2017, per court order (Dkt. 269).

Respectfully submitted,

By: /s/ Benjamin C. Caldwell

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*Counsel for Plaintiff Students for Fair Admissions, Inc.*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(a)(2), I hereby certify that Defendant's counsel was made aware of this motion before it was filed and assents to the relief requested therein.

/s/ Benjamin C. Caldwell

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Benjamin C. Caldwell